

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2017 NOV -8 PM 3:19

DEPUTY CLERK BMG

UNITED STATES OF AMERICA

v.

No. **5-17CR0100-C**

ALEJANDRO GARCIA-IZAZAGA (1)

a/k/a "Flaco" and "Alex"

ANTHONY WAYNE REILEY (2)

a/k/a "Tony"

IVAN CRUZ-MARTINEZ (3)

ZACARIAS BLANCO-OLEA (4)

AMANDA NICOLE MARNEY (5)

ERNESTO MARTINEZ, JR. (6)

PATRICIA ANN HERNANDEZ-SALAS (7)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine  
(Violation of 21 U.S.C. § 846)

From on or about a date unknown to the grand jury and continuing through on or about the date of this indictment, in the Lubbock Division of the Northern District of Texas, the Western District of Texas, the Southern District of Texas, and elsewhere, **Alejandro Garcia-Izazaga**, also known as "Flaco" and "Alex", **Anthony Wayne Reiley**, also known as "Tony", **Ivan Cruz-Martinez**, **Zacarias Blanco-Olea**, **Amanda Nicole Marney**, **Ernesto Martinez, Jr.**, and **Patricia Ann Hernandez-Salas**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with persons known and unknown to the grand jury to commit an

offense against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

With respect to defendants **Alejandro Garcia-Izazaga**, also known as “Flaco” and “Alex”, **Anthony Wayne Reiley**, also known as “Tony”, **Ivan Cruz-Martinez**, **Zacarias Blanco-Olea**, and **Amanda Nicole Marney**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

With respect to defendants **Ernesto Martinez, Jr.**, and **Patricia Ann Hernandez-Salas**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(viii).

All in violation of Title 21, United States Code, Section 846.

Count Two

Possession with Intent to Distribute 50 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about August 21, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Amanda Nicole Marney**, defendant, did intentionally and knowingly possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Possession of Firearms in Furtherance of a Drug Trafficking Crime  
(Violation of 18 U.S.C. § 924(c))

On or about August 21, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Amanda Nicole Marney**, defendant, did knowingly possess firearms, to wit: a Glock, model 34, 9mm pistol, serial number HPE209; and a Sig Sauer, model P250, 9mm pistol, serial number EAK086623, in furtherance of a drug trafficking crime, that is, Possession with Intent to Distribute 50 Grams and More of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), as charged in count two of this indictment, an offense for which she may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Four

Convicted Felon in Possession of Firearms and Ammunition  
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about August 21, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Amanda Nicole Marney**, defendant, a person who had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce firearms and ammunition, to wit: a Glock, model 34, 9mm pistol, serial number HPE209; a Sig Sauer, model P250, 9mm pistol, serial number EAK086623, and approximately thirty-three rounds of 9mm ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Five

Possession with Intent to Distribute 500 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about July 7, 2017, in the Lubbock Division of the Northern District of Texas, the Western District of Texas, and elsewhere, **Alejandro Garcia-Izazaga**, also known as “Flaco” and “Alex”, and **Anthony Wayne Reiley**, also known as “Tony”, defendants, did intentionally and knowingly possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Six

Possession of a Firearm in Furtherance of a Drug Trafficking Crime  
(Violation of 18 U.S.C. § 924(c))

On or about July 7, 2017, in the Lubbock Division of the Northern District of Texas, the Western District of Texas, and elsewhere, **Anthony Wayne Reiley**, also known as “Tony”, defendant, did knowingly possess a firearm, to wit: a Smith and Wesson, model 669, 9mm pistol, serial number TBF3829, in furtherance of a drug trafficking crime, that is, Possession with Intent to Distribute 500 Grams and More of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), as charged in count five of this indictment, an offense for which he may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Seven

Convicted Felon in Possession of a Firearm  
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about July 7, 2017, in the Lubbock Division of the Northern District of Texas, the Western District of Texas, and elsewhere, **Anthony Wayne Reiley**, also known as “Tony”, defendant, a person who had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Smith and Wesson, model 669, 9mm pistol, serial number TBF3829.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.



Count Eight

Illegal Re-Entry After Deportation

(Violation of 8 U.S.C. § 1326 and 6 U.S.C. §§ 202(3), 202(4), and 557)

On or about July 7, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Alejandro Garcia-Izazaga**, also known as “Flaco” and “Alex”, defendant, an alien, knowingly entered, attempted to enter, and was found in the United States of America after having been denied admission, excluded, deported, and removed therefrom at and near the Port of Departure at Hidalgo, Texas, on or about May 13, 2016, and not having received the express consent of the Attorney General of the United States and the Secretary of Homeland Security to apply for readmission to the United States since the time of his previous denial of admission, exclusion, deportation, and removal therefrom.

In violation of Title 8, United States Code, Section 1326(a), and Title 6, United States Code, Sections 202(3), 202(4), and 557.

Count Nine

Possession with Intent to Distribute 500 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about July 5, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Alejandro Garcia-Izazaga**, also known as “Flaco” and “Alex”, and **Zacarias Blanco-Olea**, defendants, did intentionally and knowingly possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Ten

Possession with Intent to Distribute 500 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about June 23, 2017, in the Lubbock Division of the Northern District of Texas, the Southern District of Texas, and elsewhere, **Alejandro Garcia-Izazaga**, also known as “Flaco” and “Alex”, and **Ivan Cruz-Martinez**, defendants, did intentionally and knowingly possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eleven

Possession with Intent to Distribute 50 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about June 19, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Alejandro Garcia-Izazaga**, also known as “Flaco” and “Alex”, and **Patricia Ann Hernandez-Salas**, defendants, did intentionally and knowingly possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twelve  
Distribution and Possession with Intent to Distribute  
50 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about March 31, 2017, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Ernesto Martinez, Jr.**, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Forfeiture Notice

(18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461(c))

Upon conviction of the offenses alleged in counts one, two, three, or four of this indictment, and pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461(c), defendant **Amanda Nicole Marney** shall forfeit to the United States of America any firearm involved in or used in the knowing commission of the offense, or any firearm constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the commission of the above offenses, including, but not limited to, the following: a Glock, model 34, 9mm pistol, serial number HPE209; a Sig Sauer, model P250, 9mm pistol, serial number EAK086623, and approximately thirty-three rounds of 9mm ammunition.

Upon conviction of the offenses alleged in counts one, five, six, or seven of this indictment, and pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461(c), defendant **Anthony Wayne Reiley**, also known as “Tony”, shall forfeit to the United States of America any firearm involved in or used in the knowing commission of the offense, or any firearm constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the commission of the above offenses, including, but not limited to, the following: a Smith and Wesson, model 669, 9mm pistol, serial number TBF3829.

A TRUE BILL:



FOREPERSON

JOHN R. PARKER  
UNITED STATES ATTORNEY

  
SEAN M. LONG

Assistant United States Attorney  
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E-mail: sean.long@usdoj.gov

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

LUBBOCK DIVISION

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UNITED STATES OF AMERICA

v.

ALEJANDRO GARCIA-IZAZAGA (1)

a/k/a "Flaco" and "Alex"

ANTHONY WAYNE REILEY (2)

a/k/a "Tony"

IVAN CRUZ-MARTINEZ (3)

ZACARIAS BLANCO-OLEA (4)

AMANDA NICOLE MARNEY (5)

ERNESTO MARTINEZ, JR. (6)

PATRICIA ANN HERNANDEZ-SALAS (7)

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<u>COUNT 1:</u>	CONSPIRACY TO DISTRIBUTE AND POSSESS WITH INTENT TO DISTRIBUTE METHAMPHETAMINE Title 21, United States Code, Section 846.
<u>COUNTS 2 and 11:</u>	POSSESSION WITH INTENT TO DISTRIBUTE 50 GRAMS AND MORE OF METHAMPHETAMINE Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).
<u>COUNTS 3 and 6:</u>	POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME Title 18, United States Code, Section 924(c).
<u>COUNTS 4 and 7:</u>	CONVICTED FELON IN POSSESSION OF A FIREARM Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).
<u>COUNTS 5, 9, and 10:</u>	POSSESSION WITH INTENT TO DISTRIBUTE 500 GRAMS AND MORE OF METHAMPHETAMINE Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).



COUNT 8: ILLEGAL RE-ENTRY AFTER DEPORTATION  
Title 8, United States Code, Section 1326, and Title 6, United  
States Code, Sections 202(3), 202(4), and 557.

COUNT 12: DISTRIBUTION AND POSSESSION WITH INTENT TO  
DISTRIBUTE 50 GRAMS AND MORE OF  
METHAMPHETAMINE  
Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(B)(viii).

(12 COUNTS + FORFEITURE NOTICE)

A true bill rendered:  
Lubbock



Foreperson


Filed in open court this 8<sup>th</sup> day of November, A.D. 2017.

Arrest Warrants to issue as to:

**Amanda Nicole Marney**  
**Ernesto Martinez, Jr.**  
**Patricia Ann Hernandez-Salas.**

Currently in Federal Custody:

**Alejandro Garcia-Izazaga** (Complaint 5:17-MJ-101 filed October 20, 2017)  
**Anthony Wayne Reiley** (Complaint 5:17-MJ-102 filed October 20, 2017)  
**Ivan Cruz-Martinez** (Complaint 5:17-MJ-096 filed October 12, 2017)  
**Zacarias Blanco-Olea** (Complaint 5:17-MJ-098 filed October 18, 2017)

  
UNITED STATES MAGISTRATE JUDGE